

Exhibit K

DR. WILLIAM LONGO, on 04/21/2021
CHRISTINA G. PRUDENCIO vs. JOHNSON & JOHNSON, et al.

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SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR

THE COUNTY OF ALAMEDA

CHRISTINA G. PRUDENCIO,

Plaintiff,

vs.

JOHNSON & JOHNSON; JOHNSON
& JOHNSON CONSUMER, INC.

(Sued individually and as
successor-in-interest to
JOHNSON & JOHNSON CONSUMER
COMPANIES, INC.), et al.,

Defendants.

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)
)
) Case No.
) RG20061303

Certified Transcript

) (Pages 1 - 228)

DEPOSITION OF EXPERT WITNESS

DR. WILLIAM LONGO

WEDNESDAY, APRIL 21, 2021

Reported by: KAREN C. WATERS, REGISTERED

PROFESSIONAL REPORTER

DR. WILLIAM LONGO, on 04/21/2021
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DEPOSITION OF DR. WILLIAM LONGO, taken on
behalf of Defendants, remotely via
videoconference, commencing at 9:05 a.m. (PST),
Wednesday, April 21, 2021, before Karen C.
Waters, Registered Professional Reporter.

DR. WILLIAM LONGO, on 04/21/2021
CHRISTINA G. PRUDENCIO vs. JOHNSON & JOHNSON, et al.

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1 APPEARANCES: (Via videoconference):

2
3 For Plaintiff:

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9 For Defendants LONGS DRUG STORES CALIFORNIA,
10 L.L.C., on behalf of LONGS DRUG STORES
11 CALIFORNIA, INC. (Erroneously sued as LONGS DRUG
12 STORES CALIFORNIA, L.L.C., individually and as
13 successor-in-interest, parent, alter ego, and
equitable trustee of LONGS DRUG STORES
CALIFORNIA, INC.); SAFEWAY INC.; LUCKY STORES,
INC.; and ALBERTSONS COMPANIES, INC.:

14 BARNES & THORNBURG LLP
15 BY: MITCHELL R. CHARCHALIS, ESQ.
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17
18 For Defendants JOHNSON & JOHNSON and JOHNSON &
19 JOHNSON CONSUMER INC.:

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1 APPEARANCE (Via videoconference) (continued):

2
3 For Defendant PERRIGO COMPANY OF TENNESSEE:

4 GOODELL, DEVRIES, LEECH & DANN, LLP
5 BY: JEFFREY J. HINES, ESQ.
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12 For Defendant VI-HON, INC.:

13 REED SMITH LLP
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18 (609) 987-0050
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20
21 Also Present:

22 Bret Hampton, the videographer.
23
24
25

1 ISO PLM method. Sample preparation for the
2 heavy liquid density is not the ISO method, but
3 that's what I -- what we had been calling the
4 CSM method.

5 Q. Okay.

6 A. So it's two different things. There's
7 sample prep, but then there's the analysis to
8 determine if chrysotile is present.

9 Q. Right. So that analysis follows the ISO
10 22262-1 methodology?

11 A. Yes.

12 Q. And Paul Hess, he was the individual who
13 performed all of the PLM analyses as part of
14 this report that was marked as 3F as well as the
15 part that was marked as 3G?

16 A. Yes.

17 Q. Okay. And I guess as part of this
18 report, 3F, Mr. Hess identified what he
19 identified as chrysotile at levels varying
20 from -- without the liquid separation
21 technique -- levels from .006 to .009 area
22 percent weight, correct?

23 A. I believe that's correct. I know you're
24 just reading it off the results, but I always
25 feel silly if I agree and then it's not. That

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die.)

REPORTER'S CERTIFICATE

I, KAREN WATERS, Registered Professional Reporter, do hereby certify that previous to the commencement of the examination, the said DR. WILLIAM LONGO, was duly sworn by me to testify to the truth in relation to the matters in controversy between the parties hereto; that the said deposition was taken in machine shorthand by me at the time and place aforesaid and was thereafter reduced to typewritten form; that the foregoing is a true transcript of the questions asked, testimony given, and proceedings had.

I further certify that I am not employed by, related to, nor of counsel for any of the parties herein, nor otherwise interested in the outcome of this litigation.

IN WITNESS WHEREOF, I have affixed my
Signature this April 27, 2021.



Karen Waters

_____ Reading and Signing was requested.

__x__ Reading and Signing was waived.

_____ Reading and Signing is not required.